

Public Works and Utilities

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Environmental Services

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May 18, 2006 WP53595

Ann Wessel Department of Ecology PO Box 47600 Olympia, WA 98504



Subject:

Pierce County's CWQMP

Dear Ms. Wessel:

Pierce County Water Programs is pleased to provide this draft Countywide Water Quality Monitoring Plan (CWQMP) for your review. The primary goal of the CWQMP is to provide information that will help improve the effectiveness and efficiency of our stormwater management program.

The CWQMP was prepared under our supervision by our consultant, Brown and Caldwell. We began work on the CWQMP in 2004 -- well before Ecology issued the draft of Phase I NPDES permit. Please note that Pierce County Water Programs' comments on the draft Phase I permit are being submitted under separate cover.

The CWQMP prescribes a comprehensive monitoring program that builds on the existing monitoring and research efforts of the County and other entities in our region. The plan calls for integrated biological, physical, and chemical monitoring to assess receiving water quality status and trends, and help evaluate the effectiveness of our stormwater management program in protecting beneficial uses. In addition, the monitoring program will provide near "real-time" data that can be used to quickly identify and address stormwater quality problems. The CWQMP also provides for monitoring to aid the development and implementation of TMDLs for water bodies in Pierce County's jurisdiction.

From a stormwater management perspective, we believe that the multi-faceted monitoring approach described in this CWQMP will provide more useful information than the stormwater discharge sampling prescribed in the draft NPDES permit. Our proposed monitoring program will address many more water bodies and locations than the approach proposed in the draft permit, and at lower cost. The CWQMP also provides for special studies to resolve issues identified during monitoring or to support other County initiatives. Therefore, we believe that our monitoring program



Ms. Wessel May 18, 2006 Page 2 of 2

will improve Pierce County's ability to reduce the discharge of stormwater pollutants to the maximum extent practicable, and satisfy the general intent of the NPDES permit.

Pierce County Water Programs is willing to work with Ecology to refine this CWQMP and obtain your concurrence that it meets the intent of the NPDES permit. Please contact us at 253-798-2725, if you would like to discuss.

Sincerely,

Heather Kibbey

Water Quality Specialist

HK:tr

Enclosure

cc: file

factors listed Countywide Water Quality Monitoring Plan (CWQMP, Brown and Caldewll, Feb '06, revised May '06) and the This file contains multiple, linked worksheets to derive and compare planning level cost estimates for the draft Draft NPDES MS4 Stormwater Permit (Ecology, 2/15/06). These estimates are subject to the assumptions and

Effectiveness" which contain itemized costs for each of these 2 respective MS4 monitoring requirements The "MS4 summary" sheet summarizes cost estimates developed in the two other sheets "outfalls" and "BMP The "Pierce Co details" sheet contains labor effort estimates for the CWQMP LTT and TD monitoring. The "Pierce Co" sheet summarizes and compares costs of the two programs

There are two levels of CWQMP cost estimates: one for the 9 LTT stations and another for the 25 LTT station

submittal schedule for the QAPP and the final report for 20 samples, a likely practical limitation given the apparent 2 year sampling period dictated by permit There are two levels of MS4 BMP Effectiveness monitoring; one for the required 35 sample sets, and another

\$50/hr are assumed for the CWQMP and \$80/hr for the MS4 permit work. Labor costs can be changed to examine alternative scenarios and the spreadsheets will re-calculate; values of

20%), labor hours per sampling event, false start and failure rates, equipment costs, etc Other variables are also included in the calculations and can be changed, including QC sample rate (assumed

Developed by Brown and Caldwell, March 2006, revised May 2006 (revisions in green shading) to

- 1) increase field labor needs for B-IBI and physical channel monitoring under the LTT program
- 2) add lab costs for B-IBI sample analysis (\$110 per sample, totaling \$330 for 3 replicates at each site,
- 3) increase MS4 permit outfall sampling costs for sediment parameters due to Fact Sheet pg 51 Table

Annual Costs for Pierce County Monitoring Program Options non-recurring costs preceded by "NR" [labor rates can be varied below and for itemized costs on linked "labor detail" worksheet] REVISED 5/18/06

channel in situ bioassays continuous mon reporting NR cont mon eqpt NR bioassay eqpt NR bioassay validatio successive year successive years annual hirs per FTE Grand Total	ase CWQMP # stations labor rate	first year succesive years annual hrs per FTE 5 year cost Grand Total \$	# stations labor rate B-IBI channel in situ bioassays continuous mon reporting NR cont mon eqpt NR bioassay eqpt NR bioassay validatio \$
35,000 \$ 50,000 \$ 10,000 \$ 10,000 \$ 75,000 \$ 121,000 \$ 683,000 \$	Costs per Program Elemen LTT (single station) TD (station pairs) 4 \$ 50 \$ 50	126,600 \$ 50,600 \$ 510 \$ 329,000 \$	Costs per Program Element LTT (single station) TD (station pairs) 9 4 \$ 50 \$ 50 \$ 50 \$ 10,000 \$ 11,000 \$ 14,000 \$ 10,000
5,600 \$ 11,1000 \$ 124,600 \$ 3	gram Element n pairs) totals 4	124,600 \$ 2 75,600 \$ 1 760 427,000 \$ 7	s s s s s s s s s s s s s s s s s s s
26,000 1 visit per year. 2 sites per day+ann data synth. 40,600 1 visit per year. 1 site per day+ann data synth. 61,000 2 visits per year. 5 hrs per site+data synth. 44,000 15 visits/year. 4 hrs per site +monthly data synth. annual reports 48,000 eqpt: \$4K puchase, \$2K installed per location (doubled for pair) 49,000 may have to replace eqpt periodically, but is low cost. 75,000 one time effort, consultant supported; \$50K validation+ \$25K training. 323,600 196,600 0.99 FTE, for 2 FTEs over 5 years.	2) assumes all field work using teams of 2 personnel basis/comment alternate to cover 25 stations in Tier 1 vary labor rate as needed, \$50 assumes County FTE rate	251,200 126,200 1,270 0.64 FTE, for 2 FTEs over 5 years 756,000 These estimates for CWQMP 1) do not include EDMS, travel costs, inflation	basis/comment vary labor rate as needed, \$50 assumes County FTE rate 10,000 1 visit per year, 2 sites per day+ann data synth 18,200 1 visits per year, 1 site per day+ann data synth 29,000 2 visits per year, 5hrs per site+data synth 15 visits/year, 4 hrs per site +monthly data synth annual reports eqpt: \$4K puchase, \$2K installed per location (doubled for Tier 2 pair) 2,000 may have to replace eqpt periodically, but is low cost 75,000 one time effort, consultant supported; \$50K validation+ \$25K training

Draft MS4 permit, 2/15/06	Outfalls (S8.A)	BMPs (S8.C)	BMPs (S8.C)	Comment/assumption
scenario	minimum rqmt	max practical	minimum rqmt	
min # stations		3	8	<u></u>
mın# events		15	20	35 min # events as interred in permit
QC rate		20%	20% 20%	
costs below are	annua	annual costs total program costs		•
analytical	€9	81,000 \$ 9	99,000 \$ 174,000	174,000 current ARI lab rates, \$600/sample assumed for specific pest/herbicides
analytical QC	49	33,000 \$ 4	40,000 \$ 70,000	70,000 QC blanks & dupes at same cost per sample
labor	€9	75,000 \$ 43	431,000 \$ 755,000	755,000 Jusing consultants at \$80/hr, with 1 talse start and 1 failure per quarter
sediments	S	24,000 in a	in above in above	in above 3 sed samples/year, 3 days/sample for 2 consultants at 3 outfalls
acute WET	€	2,000	na na	na lassumes WET labor concurrent with other sampling, but takes planning
flow control BMP		na \$ 6	67,000 \$ 67,000	
reporting	€9	40,000 \$ 3	32,000 \\$ 32,000	32,000 1 annual report per year
NR equipment	69	30,000 \$ 8	80,000 \$ 80,000	80,000 \$10K per auto sampling station (sampler, flowmeter, housing), installed
NR QAPP	\$	40,000 \$ 4	40,000 \$ 40,000	40,000 one time cost, approval required, assume one QAPP per program element
first year	\$	325.000 \$ 45	454 500 \$ 669 000	
succesive year(s)	÷	255,000 \$ 33	\$	
5 year cost	\$ 1,3,	,345,000 \$ 78	789,000 \$ 1,218,000	
Grand Total	\$ 2,1 2,5	2,140,000 max practical (i.e. 20 pairs of BMP effectiveness samples) 2,570,000 implied minimum (i.e. 35 pairs of BMP effectiveness samples)	20 pairs of BMP effectives	iveness samples)

Other assumptions for MS4 permit estimate:

- 1. BMP effectiveness: assume 2 year sampling program given permit schedule dictates
- 2. False starts (insuff rain/duration) and sampling tailures (eqpt/human error) assumed to expend 1/2 of the labor needed for a successful event (3 days for team of 2)
- 3. For simplicity, sampling labor assumes same effort per event for outfall and BMP sampling: 3 days for team of 2, which includes storm tracking, mobilization, demobilization, etc. Assumes 3 outfalls and 4 BMPs (station pairs) to sample per event.
- 4. Assumes consultants used due to 24-7 availability needed to meet requirements
- grab or composite (time or flow) 5. No other costs included for acute WET because permit does not specify acceptance (min survival) criteria, consequences or follow up (TIE) for toxic result, or if tests based on
- 6. For QAPPs, requirement of "one per BMP" as permit states is probably unneccesary and a single QAPP should suffice for each program element (outfalls and BMPs).

 7. minimum # sampling events as inferred in permit, but likely max of 20 would be practical limit for BMP effectiveness given apparent 2 year duration.

Cost estimate for typical TMDL study for fecal coliforms using the MST approach

one round of review and edits	100	hours for final report
includes data review, validation and synthesis	300	hours for draft report
total lab cost of \$400/sample including E. coli, and excluding MST isolates	\$325	ancillary parameters, cost per sample
need 3 replicates per sample to yield sufficeint # of non-confluent colonies	\$75	E. coli test, cost per 3 replicates
isolates (ribotyping) IEH laboratory (Mansour Samadpour)	\$75	cost per isolate
	800	goal for # MST isolates
\$90 County labor assumed \$50/hr, consultant labor assumed \$80/hr	\$50	labor rate
same for storm and baseflow events, assumes 1 8-hr day for team of 2 to sample 6 sites	16	labor, man hours per sampling event (team of 2)
	108	total # samples
	တ	number baseflow sampling events per year
	12	number stormflow sampling events per year
	6	number stations per stream/subbasin
	_	number of streams/subbasin
	_	study duration, yrs
comment	Jе	Scope assumptions value

		scale up options \$	to		final report	draft report	total analytical	total MST	total sampling labor	supplies	QA	Item	
\$	↔	ევ \$	total \$	PM \$	ort \$	97 \$	<u>ഷ</u> \$	ST \$	ŏ \$	es \$	QAPP \$	usi	
312,000 \$	249,000	233,000	201,000	18,260	5,000	15,000	43,200	60,000	14,400	5,000	40,000	ng County labor	0
\$	÷	€9	69	\$	\$	↔	↔	↔	\$	S	\$	using	Cost
343,000	279,000 for 6	263,000	232,000	21,012	9,000	27,000	43,200	60,000	25,920	5,000	40,000	using County labor using consultant labor comr	
for 10 stations 2 streams	for 6 stations 2 streams	for 10 stations, 1 stream	232,000 rounded up to nearest \$1K	10% PM rate							QAPP by consultant	comment	

[labor rate and other effort factors can be varied and summaries will re-calculate] Labor Cost Summary of Feb 06 Draft CWQMP Long Term Trend (LTT) and Targetd Development (TD) Approaches

Labor costs and hours per station per year using County labor at assumed rate

s (3 reps) \$ sanalysis \$ a analysis \$ year \$	400 300 330 800 600 1,000 4,430	eff hrs/event 8 4,0 6 6.0 7 6.6 16 8.0 12 12.0 20 5.0 20 10.0 89	ffort factors events/yr 1 1 1 1 1 2 2	#FTEs r	rate \$ 50 \$ 50 \$ 50 \$ 50	comment 50 doubled labor to 4 hrs/site (2 sites/day vs 4 sites/day) 50 annual data synthesis (not reporting) 50 Advartic Biology Assoc, \$110/sample rep, for 3 reps=\$33/50 doubled labor to 8 hrs/site (1 site/day vs 2 sites/day) 50 annual data synthesis (not reporting) 50 2 visits per year, 5hrs per site for team of 2 FTEs 50 lab dupe, data capture, data synthesis note, in this portion: note, in this portion: 1) in-situ bioassay method validation/training not included 2) equipment costs not included
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(Station pairs)		_	ellort ractors			
Item cost	hrs/yr	hrs/event	events/yr	#FTEs r	rate	
continuous mon labor \$ 6,000		120 4.0	0 15	2	\$ 50	50 weekly visit first month, then monthly: 4 hrs/station pair for 2 FTEs
continuous mon data analysis \$ 4,800	00	96 8.0	0 12	1	\$ 50	monthly data synthesis and summary; 1 day effort per station pair
phys channel \$ 1	800	16 8.0	0 1	2	\$ 50	doubled labor to 8 hrs/site (1 site/day vs.2 sites/day)
nalysis \$	600	12 12.0	0 1		\$ 50	50 annual data synthesis (not reporting)
\$	1,600	32 8.0	0 2	2	\$ 50	2 visits per year, 8hrs per station pair for team of 2 FTEs
in situ bioassay data analysis \$ 1,000		20 10.0	0 2	1	\$ 50	lab dupe, data capture, data synthesis
total per station pair per year \$ 14,800		296				

Cost Estimate Summary for Counties to meet MS4 Stormwater Monitoring Requirements (based on 2/15/06 draft permit) assumes independent option selected, also, Ports have different scope revised 5/18/06 to include cost of sediment analysis per Fact Sheet pg 51 Table

\$ 85,000 not including QAPP	\$ 85,000	13,333	€	500	5	\$ 6,000 \$		304	25,000	€9	38,000	per outfall per year \$	
40,000 \$ 252,000 not including eqpt	\$ 252,000	40,000	€9 -		1,500	\$ 24,000 \$		913	\$73,000	\$	113,000	per year \$	
	\$1,328,000	200.000 \$1.328.00	40,000 \$	8,000 \$ 4	8.00	\$ 120,000 \$	30,000	4,563 \$	365,000	\$ 36	565,000	Outfall monitoring \$	S8.A
	otal	Annual Report total	Annu	QAPP	Ē	sediments WE		labor hrs eqp:		labor cost	analytical		ram
						Cost Element							1

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program c						BMP Effectiveness	ement	
program unianon, yis	# Siles	# events	year 2 \$	year 1 \$	per event \$	€9	ar	
7	4 (20	49,500	49,500	4,950	99,000		
			\$ 215,500	\$ 215,500	\$ 21,550	\$ 431,000	labor cost	
			2,694	2,694	135	5,388	labor hrs eqpt	
				\$ 80,000		\$ 80,000 \$ 67,000 \$ 40,000 \$	eqpt	
			69	5		\$	ij	C
			33,500	33,500		67,000	flow control QAPP	Cost Element
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				40,000		40,000	Å,	
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		,	320,000	130,000	\$2.05. 3 60.5555.6	49.000	total	

Cost Estimate for 2/15/06 Draft MS4 Permit Stormwater Outfall Monitoring Portion (S8.A) revised 5/18/06 to include cost of sediment analysis per Fact Sheet pg 51 Table

			Yea													
\$ 1,790	analyticat	cost	years of Indiatoring III tills estimate	acute WET samples per year	Š	S.	labor hrs per event per outfall			# Tallit	# False Su	# EVE	iolai # oulia	silenno #	# 2: #f= -	c
\$1,280 \$3,070	labor	cost/event/outfall	ilis estifiate	oles per year	sample types: Grab	sample types: FW Comp "full duration"	nt per outfall	labor rate	QC rate	# lallures per year	# falls per year	# events per year	Clair de Collais lo sample	# outrails per lanouse	# landuses	ost Estimate I
\$3,070	total		O	ı		:W Comp	6	\$80	20%	2	4	<u>.</u>	, 0	. _		actors &
\$1,920 \$1,920 \$32,220 \$37,590 \$24,320 \$ 500 \$ 38,866	false start,	other costs			"earlyand skimmed" implies manual sampling as only means) "full duration" difficult to do without modifying sampler or nursing It to renew bottles	3 days for team of 2 (6man days) to service 3 outfalls			1 per qtr; no analytical spent, but use 50% of event labor	i per qu', no analytical spent, but use 50% of event labor				commercial, LDR, HDR for COUNTIES, Cities do Ind instead of LDR	Cost Estimate Factors & Assumptions
37,590 \$24,320 \$	analyt labor	totai anr			as only means	ifying sampler or nursing	ils:			labor	labor				nd instead of LDR	
500 \$ 7,860 \$	WET sediments	totai annual costs per outfall				It to renew bottles	 "calculate annual, seaonsal loads for storm and baseflow" 	 "long term program for trends" 	 sample sediments 3 times per year 	 assumes WET sampling labor concurrent with routine event 	 does not include TIE for WET 	 do acute WET annually 	• provide flow-weighted c	 sample 75% of the stor 	 sample 3 outfalls in the 	Narrative:
70,270	total						nsal loads for	trends"	es per year	g labor concu	WET	in one summ	omposites to	ms up to 15 e	entire county	
\$ 10,000	eqpt						storm and			rrent with n		er/fall storr.	r list, and n	vents per v	; each repr	
70,270 \$ 10,000 see MS4 summary	ann report final report	reporting					baseflow"			outine event		 do acute WET annually in one summer/fall storm per year (no consequences) 	 provide flow-weighted composites for list, and manual grabs for TPH and bacteria 	storms up to 15 events per year (75% would likely be >15 events, so use 15 min)	the entire county, each representing a single fumped landuse	
\$ 210,810 \$ 1,084,050	m	†otal										nces)	d bacteria	>15 events, so use	landuse	
\$ 1,084,050	total													3 15 min)		

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MS4 Permit BMP Effectiveness Monitoring Portion
Companson of the two draft versions of permit requirements
elements compared side by side, crosshatched where absent in one or the other draft version
significant changes shaded gray

	Sizyrs individ siz 5 yrs collaborative	implemented in ≤36 months	
	THE WATER THE STATE OF		
	1 yr. 1.5 yrs for final QAPP (2.5 # collab)	adopted in ≤30 months	ļ.
		"framework for Ph II permittees"	
	W.C. House in other piece series		sediment testing
	No details on methods, freq. evaluation (e.g. TQLP: MTCA, sed stds), etc. TAPE.&	9	sediment sampling
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			event wx info
param cost source		≌	Flow (rate, dur, vol)
varian post pouro	Statistical doubles continuous ages nower may an abance out a more than	methods, trea defined by permitte's QAPP	
	V .	-	
		Program Dev, review and approval in ≤2 years	N
		no ramts for "other special permittees"	Ь.
	a) banaa aaab a kacamaa aaaana	provide staff assistance	\.
	S8.C.3 by naired study or predicted outcome	one Q strategy per City & County permittee (not Port)	,=
		prioritized list	=-
	same list	Oil (lin sand filter, CBI)	(3)
	same list	Enhanced (5 public domain)	(2)
	cama let	Basic (5 public domain)	(1)
		design criteria "similar to" manual	
	Olipe Condition of by Dark additioner Throat	all permittees	
	TOOOS TO TOO TOO TOO TOO TOO TOO TOO TOO	test all BMPs listed (12)	
	CARACTE OF THE TACKNOON OF THE	The processor for succession of the processor for succession o	
		TADE proposition short det time	2
	~	no while of contractor	
	SBC3 V	do OAPP for each BMP and O strategy	
		6 flow radiustion strategies (overall among possitions)	
	30U.1 V	22 sites per (treatment) RMP	
	~	collaborative police	-
		z questions to be addressed	
		characteize Flow Reduction Strategies	,
	V	characterize treatment BMPs	
	evaluate O&M rgmls		
	i "full scale field monitoring"	"comprehensive, long term"	
	SBC begin section	begin section	S6B

Cost Estimate for 2/15/06 Draft MS4 Permit Stormwater Monitoring for Treatment BMP Effectiveness (S8.C)

Scope Narrative, per permittee

- 4 BMP installations with a pair of auto samplers and flowmeters at each BMP inlet and outlet=8 monitoring stations.
 1 flow control BMP (paired inlet/outlet continuous flow monitoring)
- full QAPP+TAPE for each BMP (thus, 2 QAPPs, but that is not necessary, so assume single QAPP) implement by end or year 2, sample ~2 years, submit final report by end or year 4
- assume min 20 events (up to 35 in ~ 2 years is unlikely achievable)
- false starts (good samples, bad events) and system failures (bad samples, good events) will be significant
- sediment samples of accumulated sediment in each BMP-permit text vague, assume bulk samples collected at 1/2 the stormwater sampling frequency, assume labor incidental to stormwater sampling

-							
labor hrs per annual report per BMP family	labor hrs per event per BMP sampling station pair	labor rate	QC rate	# fallures	# raise starts	# events	Cost Estimate Factors & Assumptions
50 (100 hours for program per year for 2 years)	48 3 days for team of 2 (6 man days)	\$80 consultant supported	20% field eqpt blanks and dupes for all params	8 1 per qtr; no analytical spent, but use 50% of event labor	8 1 per qtr; no analytical spent, but use 50% of event labor	20 full analytical & labor, completed in 2 years	ors & Assumptions
		\$ 8,000 OEM system	nlastic garden shed	bler/xducer \$ 3,000 for open channels/w	a-velocity \$ 4,000 needed for rou	\$ 4,000	ilem type comment

labor hrs per final report per BMP family 48 00 8 (100 hours for program per year for 2 years)
(200 hours total for final report)
total hours over 2 years (12 man weeks) for single site for flow monitoring, data synthesis and evaluation

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total reporting labor hours in above total annual report hours (2 annual reports) total final report hours

200 200

32,000

field labor days in above field labor months in above field labor hours in above

5,856 732 37

2,928 includes flow control labor 366 18

per person